

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HUGHES RIVER FM, LLC,
a Delaware limited liability company,

Plaintiff,

v.

XIMALAYA, INC.,
a Cayman Islands corporation,
YU JIANJUN, an individual,
SEAMAN YU, an individual,
XIAOYU CHEN, an individual,
LI HAIBO, an individual,
and TENCENT MUSIC ENTERTAINMENT
GROUP, INC., a Cayman Islands
corporation,

Defendants.

Civil Case No. 1:25-cv-06217

Hon. Edmond E. Chang

UNOPPOSED MOTION TO EXTEND DATE TO RESPOND TO COMPLAINT

Defendants Ximalaya, Inc., Seaman Yu, Yu Jianjun (duplicate of Seaman Yu), Xiaoyu [*sic*] Chen, and Li Haibo (“**Defendants**”) move to extend by eighteen (18) days the deadline for all Defendants¹ to move against, answer, or otherwise respond to Plaintiff Hughes River FM, LLC’s (“**Plaintiff**”) Complaint (Dkt. 1) and to request that the Court enter the below proposed briefing schedule. In support of their motion, Defendants state:

¹ Defendants move with consent from Defendant Tencent Music Entertainment Group, Inc.

1. Defendants request an additional eighteen (18) days to properly respond to Plaintiff's Complaint. Plaintiff filed its Complaint on June 6, 2025, and has represented that it served Defendants on June 12, 2025. Based on a service date of June 12, 2025, an eighteen (18) day extension would extend the responsive pleading deadline to July 25, 2025.
2. Defendants have good cause for this extension. A proper defense against the causes of action requires additional time. This is Defendants' first request for an extension to respond to the Complaint and the additional time Defendants seek is not intended to unreasonably delay the matter or harass Plaintiff, nor will any party be prejudiced by the delay.
3. Counsel for all Defendants and Plaintiff have conferred regarding this extension and agreed to the following proposed briefing schedule to the extent that a motion to dismiss is filed. Defendants shall file their motions to dismiss on July 25, 2025; Plaintiff shall file any opposition by August 25, 2025; Defendants shall file any reply by September 15, 2025. Defendants submit this briefing schedule without waiver of any jurisdictional defense, including but not limited to lack of personal jurisdiction and insufficient service of process. The parties accordingly respectfully request that the Court enter an order to provide for the above schedule.

Dated: July 3, 2025

RESPECTFULLY SUBMITTED,

Defendants Ximalaya, Inc., Seaman Yu, Yu
Jianjun (duplicate of Seaman Yu), Xiaoyu [sic]
Chen, and Li Haibo

By: /s/ Kenneth J. Vanko

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Yu, Yu Jianjun (duplicate of Seaman Yu),
Xiaoyu [sic] Chen, and Li Haibo*

CERTIFICATE OF SERVICE

I certify that on July 3, 2025, I caused the foregoing to be electronically filed with the Clerk of the U.S. District Court for the Northern District of Illinois/Eastern Division using the CM/ECF system, which will send notification of such filings to all registered users:

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Dated: July 3, 2025

By: /s/Kenneth J. Vanko